

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: :
: Bankruptcy Case #22-14539-JKS
NATIONAL REALTY INVESTMENT :
ADVISORS LLC : Chapter 11
Debtor :

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE, that the undersigned hereby appears as counsel for **PNC EQUIPMENT FINANCE, LLC ("PNC")**, an interested party in the above-captioned case and hereby requests, pursuant to U.S. Bankruptcy Court Rules 2002 and 9007, and 11 U.S.C. §§ 342 and 1109(b) of the U.S. Bankruptcy Code, that all copies and pleadings given or filed in this case be given and served upon counsel at the following address and telephone number:

**Matthew A. Foley, Esquire
Robert E. Walton, Esquire
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PLEASE TAKE FURTHER NOTICE that under 11 U.S.C. § 1109(b) of the U.S. Bankruptcy Code, this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed

by mail, e-mail, hand delivery, telephone, telegraph, facsimile, telex, or otherwise: (1) that affects or seeks to affect in any way any rights or interest of any creditor or any party-in-interest in this case, including PNC, with respect to (a) the debtor; (b) property of the estate or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or conduct by the delivery of any property, payment, or other conduct by PNC.

PLEASE TAKE FURTHER NOTICE that PNC, intends that neither this Notice of Appearance nor any later appearance, claim, or other pleadings shall waive (1) PNC's right to have final Orders in non-core matters entered only after *de novo* review by the United States District Court; (2) PNC's right to trial by jury in any proceeding related to this case; (3) PNC's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any rights, claims, actions, defenses, set-offs or recritments to which PNC, is or may be entitled to under agreement, in law or at equity, all of which rights, claims, actions, defenses, set-off or recritments PNC, hereby expressly reserves.

FLAMM WALTON HEIMBACH

By: /s/ Matthew A. Foley

Dated: June 23, 2022

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Notice of Appearance, Request for Service of Papers and Reservation of Rights in the above-captioned matter was served on the parties of record via electronic mail.

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By: /s/ Matthew A. Foley
Matthew A. Foley

Dated: June 23, 2022